



Ian Gordon

Chair

Southland Wind Farm Fast-track Application Expert Panel

Environmental Protection Authority

Wellington

By email substantive@fasttrack.govt.nz

RE: Southland Wind Farm FTAA - 2508-1095 Invitation to Comment

Dear Ian,

I am writing to offer some brief comments on the Southland Wind Farm project currently under the panel's consideration.

As you will be aware, the decision to decline the Southland Wind Farm project under the Covid-19 Recovery (Fast-track Consenting) Act 2020 (FTCA) was in large part due to concerns about the impact it would have on wetland ecosystems on the Jedburgh Plateau. As the conclusion section of the decision document noted, "the Panel is not satisfied adverse effects on the important values on the Jedburgh Plateau (and the candidate ONF area) could be offset or compensated for in a way that will achieve the purpose of the FTCA".¹

I do not wish to dwell on the previous decision and am aware that the legal test in the current regime has changed in any case. I would however like to draw the panel's attention to two areas of disagreement that featured prominently in the previous decision. Both relate to the likely effects (both good and bad) of the Southland Wind Farm project on the ecology of the Jedburgh Plateau.

The first area of disagreement centered on how the ecology of the Jedburgh Plateau should be conceptualised. While that may sound somewhat philosophical, it matters a great deal when it comes to assessing the ecological impact of the project.

For the applicants' ecologists (Wildlands), the Jedburgh Plateau comprises a network of fen and bog wetlands separated by areas of terrestrial manuka dominated shrubland – with the latter considered to have significantly less ecological value than the former.² When thought about in this

¹ [Southland-Wind-Farm-Decision_FINAL-1.pdf](#)

² [Appendix-D-Terrestrial-and-Wetland-Ecology-Assessment.pdf](#)



way, it follows that much of the ecological impact associated with road and turbine development on the plateau can be minimised by avoiding the wetlands.

For the independent ecologist appointed by the previous Panel (Mike Harding) however, the ecology on the Jedburgh Plateau should be thought of more holistically – as a coherent complex system rather than discrete individual features.³ When thought about like that, it follows that road and turbine development will result in more harm due to the potential for issues such as fragmentation, edge effects, and changes in the hydrological regime regardless of how it is located.

The second area of disagreement concerned how much value should be accorded to the offsetting and compensation proposals put forward by the Applicant (fencing and pest control on the Jedburgh Plateau in particular). Here, much depends on the counterfactual – i.e., how the Jedburgh ecology might evolve if the wind farm (and associated offsetting and compensation measures) *do not* go ahead. Again, different ecologists had different views on this.

For Wildlands, browsing by domestic livestock and feral animals is hindering successional processes and preventing reversion of much of the Jedburgh Plateau to something more akin to its former natural state.⁴ If that is indeed the case, it follows that the proposals to undertake fencing and browser control would offer considerable ecological benefits over the status quo.

For Mike Harding though, browsing is affecting – but not necessarily preventing – vegetation on parts of the plateau from regenerating into forest.⁵ Mr Harding also supported a view (expressed by Environment Southland⁶) that stock removal from wetlands is already a legal requirement and so should not be considered additional to the project or a suitable form of offsetting.⁷

In weighing up whether the effects are sufficiently significant to be out of proportion to the benefits of the project, it is particularly important that any economic analysis of the benefits is robust and independently verified. The panel should assure itself that all costs (including the potential irreplaceability of any ecological values) are accounted for and appropriately evaluated.

I am neither qualified nor familiar enough with the local context to pronounce on these matters. I highlight them only because I suspect they will be central to the panel's determination on the Southland Wind Farm project this time around. This leads me to suggest that the panel, in its deliberations, ensures that it has adequate information and advice to form an informed opinion as to:

- How the ecology of the plateau should be appropriately defined/delineated
- How the ecology of the plateau is likely to change in the future, both under current management and under the proposed changes.

³ [Southland-Wind-Farm-Ecology-Review-Mike-Harding.pdf](#)

⁴ [Terrestrial-Ecology-Addendum.pdf](#)

⁵ [SWF_Supplementary-Statement_Mike-Harding-21-December-2024.pdf](#) – at 18.

⁶ [24July24_Environment-Southland_FTC126_Comments-Received.pdf](#) – p6 and p8.

⁷ [Southland-Wind-Farm-Ecology-Review-Mike-Harding-30-August-2024.pdf](#) – at 164.



- Whether the cost of the almost certain material harm, and potential ‘loss’ of significant indigenous biodiversity, is in proportion to the benefits of the proposal and the extent to which those costs can be mitigated by restoration, the success of which is likely to be uncertain.

It may be that panel members do not consider themselves well-placed to make such assessments. If that is the case, I would encourage the panel to seek additional independent ecological and economic advice.

Rt. Hon. Simon Upton

Parliamentary Commissioner for the Environment

Te Kaitiaki Taiao a Te Whare Pāremata